

***Response to Comments from Mike Alesandrini***  
***St. Louis RCGA***  
***Received by email: March 29, 2005***

*Given that tanks, CERCLA and RCRA sites all have their own set of hoops to jump through that are fairly well defined, it seems that the most significant impact of this guidance may be felt in the VCP arena. As those sites, by definition, are (generally) less contaminated, market driven and often managed by folks with less capital and environmental sophistication, a highly complicated RBCA process might be inconsistent with the incentive-based flavor of a voluntary clean-up program. While I don't have specific suggestions as to how/where to simplify the guidance, it seems appropriate to shoot for "simplicity and user friendly" as the adjectives that might describe the final document.*

**Response:** The department is anxious to simplify, clarify and make the guidance more user friendly. While retaining scientific integrity, department staff worked very hard to simplify and clarify language when writing the draft guidance. We have found it a challenge to create guidance that can provide consistent risk-based remediation guidance for the Voluntary Clean-Up Program, state cleanup programs such as the Registry and the Cooperative Program, and established federally regulated programs such as the Comprehensive (CERCLA) and the Resource Recovery and Act (RCRA).

We received some suggestions in line with your suggestion from Workgroup members who commented on the guidance, and we have incorporated these where possible. We are also open to further suggestions and will be glad to discuss any improvements in this area at the April 28 Workgroup meeting.

*At some point, further discussion may be appropriate to address situations in which measured contamination levels on a site, particularly in an urban setting, reflect the background for that particular urban setting which are not site-specific and are not the responsibility of the current or past owners/operators of the site. In other words, how do we address situations in which RBCA might require a clean-up of a site well beyond the background levels of all the other properties in the immediate vicinity which have accrued a collective level of contamination associated with years of a ubiquitous urban environment?*

**Response:** Historically, the department has not required that the remediating party clean up naturally occurring Chemicals of Concern below background levels. For a chemical that may be ubiquitous in an urban environment, we believe that the site risk of these chemicals should be evaluated in the MRBCA process and factored into risk management decisions. We will add this issue to the April 28 meeting to discuss further.